

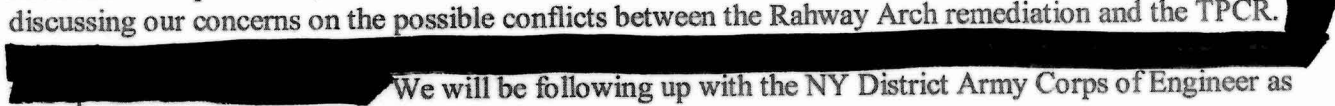
**Soil Safe's Rahway Arch Project and the Tremley Point Connector Road (TPCR)**  
**Carteret and Linden, NJ**  
**January 2014**

**Issue:** NY/NJ Baykeeper has expressed concerns with use of petroleum-contaminated soils to remediate a toxic site that is located in the Rahway River floodplain and was overrun by the surge from Hurricane Sandy.

**Background:** The old American Cyanamid property overlooking the Rahway River has 15 of its 125 acres covered with cyanide-tainted sludge. The site pre-dates the Resource Conservation and Recovery Act. The **Rahway Arch project** is the remediation and redevelopment of this site which within the tidal floodplain. The project would remediate six structurally compromised sludge pits formerly owned by American Cyanamid. NJ DEP approved conditional **permits for Soil Safe**, a Maryland company, to use 1.6 million tons of petroleum-contaminated soil (specific source locations are currently unidentified) to cap the site up to 29 feet. The host borough is expected to receive \$2.7 million in tipping fees, which would be invested in waterfront recreational opportunities, including a river walk built on other remediated sites owned by DuPont and U.S. Metals.

The New Jersey Turnpike Authority-sponsored **Tremley Point Connector Road** is a new, county-owned and maintained, four-lane, predominantly pile-supported roadway/bridge that will intersect with Industrial Highway (Exit 12 off the NJ Turnpike) in Carteret, Middlesex County; traverse the Rahway River; and connect at Tremley Point Road in Linden, Union County. As the TPCR would cross a navigable river and require Coast Guard (CG) permitting, the CG has been the Federal lead agency for the NEPA process. The process started in 2005. The Road would provide a new route for trucks and traffic to access an approximately 400-acre brownfield area and enable its redevelopment by Union County and the Town of Linden with warehousing and manufacturing. With the exception of using South Wood Avenue, which is adjacent to mixed use and residential areas, the brownfield site is inaccessible. The TPCR will be routed over the Rahway Arch project site. The Coast Guard recently released its finding of no significant impact for the TPCR project. However, it failed to provide technical support for its conclusion that the road/bridge supports will not compromise the Rahway Arch project cap. USACE, who also needs to issue a permit for the project, has yet to indicate whether it will prepare a separate NEPA document.

**Status:** EPA does not have direct authority over the NJDEP's permitting of the Rahway Arch Project. The Coast Guard completed its Section 9 permitting for the Tremley Point Connector Road project when it released the Tremley Point Connector Road Project Reevaluation Final Environmental Assessment (EA) in November 2013. EPA commented on the Draft EA on December 13, 2007, the Final EA on August 30, 2010 (disagreeing with the Coast Guard's FONSI), on May 2, 2011 (repeating our concerns) and finally on May 15, 2013 reiterating EPA's concerns on wetlands mitigation. When we received word that Rahway Arch had been permitted, EPA also sent several emails to the NJ Turnpike Authority and the Coast Guard discussing our concerns on the possible conflicts between the Rahway Arch remediation and the TPCR.

 We will be following up with the NY District Army Corps of Engineer as they process the TPCR Section 404 permit.

*Draft Deliberate  
Process  
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